

June 18, 2004

The Honorable Judge Robert E. Keeton  
United States District Court  
Eastern Division of Massachusetts  
One Courthouse Way  
Boston, MA 02210

Attention: Court Clerk

RE: Zipwall, LLC v. C&S Manufacturing, Inc.  
Civil Action No. 04 CV10079(REK)

Dear Judge Keeton or Court Clerk:

I am the President of C & S Manufacturing, Inc. and last week I was away on vacation. When I left, our attorneys, Grossman & Flight, were our attorneys in this case and I had no understanding they were in the process of withdrawing other than the attached fax they sent on May 21, 2004. My husband called in response and left a message that I could not consent to their withdrawing unless they could help find a new firm to appear. This was not something I thought would be finalized while I was away, but when I returned on June 14, 2004, there was a box of documents at my house that included your Order allowing our Attorneys to withdraw and that set June 23, 2004 for me to be in Massachusetts to explain what happened.

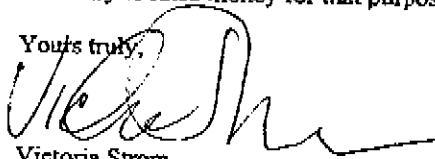
C & S Manufacturing, Inc. is a small company with very modest earnings. Last year was very bad and I am trying to have the company survive while incurring great expense for lawyers' fees. Finding a good patent lawyer was difficult, but finding one here that can represent the company in Boston on what amounts to nine (9) days notice is almost impossible.

While I do not know what Mr. Grossman said in his first motion to withdraw, I was given a copy of the reply that was filed and despite what was written, we did not want them to withdraw from our Illinois case and did not agree. Once Judge Shader in Illinois said they could nonetheless withdraw, we did get a new lawyer within the 21 days we were given. Except for a one page fax asking for our consent to withdraw we had no understanding that they were so actively trying to withdraw from the case in Boston. No consent was given and now we have this surprise emergency.

I can understand why it would be difficult for them to handle this in Boston, but the intent was always for them to help us find a lawyer in Boston.

In summary, please give us more time to find a lawyer. While I would hope that could be soon, because of our financial difficulty, I ask for 30 days in order to try to raise money for that purpose.

Yours truly,



Victoria Strom  
President  
C & S Manufacturing, Inc.  
1100 Westfield Way  
Mundelein, Illinois 60060  
(847) 949-6959

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ZIPWALL, LLC,

Plaintiff

v.

C & S MANUFACTURING, INC.,

Defendant

)  
)  
)  
) CIVIL ACTION  
) NO. 04-10079-REK  
)  
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ORDER

June 9, 2004

The court hereby orders defendant, C & S Manufacturing, Inc., to appear before this court at noon on June 23, 2004, to show cause, if any exists, why it should not be held in default, and suffer judgment against it.



Robert E. Keeton  
Senior United States District Judge